

**JAMES S. RICHTER**  
Of Counsel  
(201) 874-7325 (m)  
[jrichter@midlige-richter.com](mailto:jrichter@midlige-richter.com)

December 3, 2024

**BY ECF**

Honorable Cathy L. Waldor, U.S.M.J.  
United States District Court  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *In Re Selenious Acid Litigation*  
*Civil Action No. 24 CV 7791 (BRM)(CLW)***

Dear Judge Waldor:

This firm, together with Winston & Strawn LLP, represents Defendants, Somerset Therapeutics, LLC, Somerset Pharma, LLC and Odin Pharmaceuticals, LLC (collectively “Somerset Pharma”) in the above-referenced matter. Pursuant to Your Honor’s preferences with respect to *pro hac vice* applications on consent, enclosed please find a copy of the following, submitted on Somerset Pharma’s behalf:

1. Declaration of James S. Richter in support of application for admission of counsel *pro hac vice*.
2. Declaration of Kurt A. Mathas.
3. Declaration of Kevin J. Boyle.
4. Declaration of Lauren M. Rennecker.
5. Proposed form of Order granting admission of counsel *pro hac vice*.

Plaintiff’s counsel has consented to this application and the *pro hac vice* admission of counsel. If the enclosed proposed form of Order is acceptable to Your Honor, we respectfully request that it be entered.



T. 908.626.0622  
F. 908.626.0322



[www.midlige-richter.com](http://www.midlige-richter.com)  
[info@midlige-richter.com](mailto:info@midlige-richter.com)



645 Martinsville Road  
Basking Ridge, NJ 07920

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We thank Your Honor for your consideration of this request. Should Your Honor have any questions, we are available at your convenience.

Respectfully submitted,

s/ James S. Richter

James S. Richter

Encl.

Cc: All Counsel of Record (w/encl)(by ECF)

